



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

December 7, 2012

James Kelly, IDT Leader POW Planning  
Thorne Bay Ranger District  
P.O. Box 19001  
Thorne Bay, Alaska 99919

Re: EPA comments on the US Forest Service Big Thorne Project Draft Environmental Impact Statement, EPA Project #11-010-AFS.

Dear Mr. Kelly:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the Big Thorne Project on Prince of Wales Island in southeast Alaska (CEQ #20120341). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

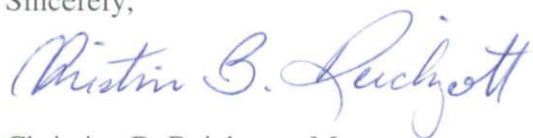
We have given the EIS an overall rating of EC-1 (Environmental Concerns-Adequate Information). A description of our rating system is enclosed. Overall we believe the EIS strikes a good balance between the need to provide a local, economic supply of timber and the consideration of the various resources and issues identified in the Forest Management Plan, as well as those concerns identified in the scoping process. It will also support the local industry of an area that is dependent on this sector and has extensive infrastructure (sawmills, roads, log transfer facilities, etc.) to extract and process the timber.

We are concerned, however, that the Proposed Action (Alternative 2) is focused on supply and minimizes the protections or considerations of other resources, particularly the cumulative effects to those resources. As stated in the EIS, Alternative 4 is generally more protective of resources, particularly in protecting Old Growth Habitat and aquatic resources within sensitive subwatersheds. As such, we believe it is environmentally preferable.

Because Alternative 4 only focuses on select resources, however, we recommend that the Forest Service consider identifying a hybrid preferred alternative in the Final EIS that is more protective of the other important issues and resources identified in Alternatives 3 and 5 (new road construction, costs and benefits, and cumulative subwatershed effects) as well. We especially encourage additional assessment in the Final EIS to determine if impacts can be further avoided or minimized, particularly cumulative effects to water quality within the subwatersheds with extensive past activity.

Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to working with you on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.